

February 06, 2006

## **By Electronic Filing**

Ms. Marlene Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> St. SW Washington, DC 20554

Re:

EB Docket No. 06-36

EB-06-TC-060

**Certification of CPNI Filing** 

Ms. Dortch:

On behalf of Marathon Communications, in response to the Public Notice in the above referenced matter (DA 06-233, rel. January 30, 2006), is its annual CPNI compliance certification pursuant to section 64.2009(e) of the Commission's rules.

Sincerely,

Christopher Gillen

Cc: Byron McCoy

Best Copy & Printing, Inc.

## CERTIFICATION PURSUANT TO 47 C.F.R. 64,2009(e)

I hereby certify, on behalf of Marathon Communications (hereafter "the Company"),that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with Part 64, Subpart U of the rules and regulations of the Federal Communications Commission regarding Customer Proprietary Network Information ("CPNI") (47 C.F.R. 64.2001 et seq.)

Attached hereto is a statement of the Company's operating procedures to ensure that it is in compliance with these rules.

Signed:

Marcos Melendez

Title: CEO

Dated: February 6, 2006

## STATEMENT OF CPNI OPERATING PROCEDURES

- 1. It is the policy of Marathon Communications ("the Company") not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI") as defined in the FCC's rules, for any purpose other than the following, all of which are permitted under FCC rules without customer approval:
  - For the purpose of providing or marketing Company service offerings among categories of service (i.e. Local, interexchange) to which the customer already subscribes.
  - b. For the purpose of providing inside wiring installation, maintenance and repair services.
  - c. For the purpose of marketing "adjunct to basic" services, such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.
  - d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraudulent, abusive or unlawful use of or subscription to such services.
- The Company has established a program to inform and train personnel that they may not use, disclose, or permit access to CPNI for any purpose other than those set forth above. The Company has an express disciplinary process in place to discipline violations of its CPNI policy.
- Because the Company does not use, disclose, or permit access to CPNI except as described above, it
  does not maintain a record of its or affiliates' sales and marketing campaigns that use customers' CPNI,
  or of instances where CPNI is disclosed or provided to third parties, or where third parties were allowed
  access to CPNI.
- 4. The Company has in place a supervisory review process regarding compliance with its CPNI policy.